

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>ePLUS INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 3:09-CV-620 (REP)</b>
	)	
<b>v.</b>	)	
	)	
<b>LAWSON SOFTWARE, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

**PLAINTIFF ePLUS INC.'S NOTICE OF FILING OF PROPOSED JUDGMENT**

Craig T. Merritt (VSB #20281)  
Henry I. Willett, III (VSB #44655)  
**CHRISTIAN & BARTON, LLP**  
909 East Main Street, Suite 1200  
Richmond, Virginia 23219-3095  
Telephone: (804) 697-4100

Scott L. Robertson (admitted *pro hac vice*)  
Jennifer A. Albert (admitted *pro hac vice*)  
David M. Young (VSB #35997)  
**GOODWIN PROCTER LLP**  
901 New York Avenue, N.W.  
Washington, DC 20001  
Telephone: (202) 346-4000

Michael G. Strapp (admitted *pro hac vice*)  
**GOODWIN PROCTER LLP**  
Exchange Place  
53 State Street  
Boston, MA 02109-2881  
Telephone: (617) 570-1000

*Counsel for Plaintiff ePlus Inc.*

Pursuant to Fed. R. Civ. P. 58<sup>1</sup> and the Court's instructions following the return of the jury verdict in the trial of this case, plaintiff *ePlus Inc.* ("*ePlus*"), by counsel, hereby proffers the attached proposed Judgment reflecting the jury's verdict and the Court's rulings on non-jury issues. The proposed judgment is intended to reflect the jury's verdict and the Court's rulings.<sup>2</sup>

Respectfully submitted,

May 2, 2011

/s/

David M. Young (VSB #35997)  
Scott L. Robertson (*admitted pro hac vice*)  
Jennifer A. Albert (*admitted pro hac vice*)  
Counsel for Plaintiff *ePlus Inc.*  
**GOODWIN PROCTER LLP**  
901 New York Avenue, N.W.  
Washington, DC 20001  
Telephone: (202) 346-4000  
Facsimile: (202) 346-4444  
dyoung@goodwinprocter.com  
srobertson@goodwinprocter.com  
jalbert@goodwinprocter.com

Craig T. Merritt (VSB #20281)  
Henry I. Willett, III (VSB #44655)  
Counsel for Plaintiff *ePlus Inc.*  
**CHRISTIAN & BARTON, LLP**  
909 East Main Street, Suite 1200  
Richmond, Virginia 23219-3095  
Telephone: (804) 697-4100  
Facsimile: (804) 697-4112  
cmerritt@cblaw.com

---

<sup>1</sup> Rule 58 provides, in pertinent part, that "Every judgment ... must be set out in a separate document ...." Fed. R. Civ. P. 58(a).

<sup>2</sup> Of course, by submitting this proposed judgment, *ePlus* expressly reserves, and does not waive, its right to challenge the jury's verdict as to those claims of the patents-in-suit found not infringed, pursuant to Fed. R. Civ. P. 50(b), at the appropriate time.

Michael G. Strapp (*admitted pro hac vice*)

**GOODWIN PROCTER LLP**

Exchange Place

53 State Street

Boston, MA 02109-2881

Telephone: (617) 570-1000

Facsimile: (617) 523-1231

mstrapp@goodwinprocter.com

Attorneys for Plaintiff ePlus Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of May, 2011, I will electronically file the foregoing

**PLAINTIFF ePLUS INC.'S NOTICE OF FILING OF PROPOSED JUDGMENT**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

Daniel McDonald, *pro hac vice*  
William D. Schultz, *pro hac vice*  
Rachel C. Hughey, *pro hac vice*  
Andrew Lagatta, *pro hac vice*

MERCHANT & GOULD

3200 IDS Center

80 South Eighth Street

Minneapolis, MN 55402

Telephone: (612) 332-5300

Facsimile: 612) 332-9081

lawsonservice@merchantgould.com

***Counsel for Defendant Lawson Software, Inc.***

Robert A. Angle, VSB#37691

Dabney J. Carr, IV, VSB #28679

TROUTMAN SANDERS LLP

P.O. Box 1122

Richmond, Virginia 23218-1122

(804) 697-1238

(804) 698-5119 (Fax)

robert.angle@troutmansanders.com

dabney.carr@troutmansanders.com

***Counsel for Defendant Lawson Software, Inc.***

/s/

David M. Young (VSB #35997)

**GOODWIN PROCTER LLP**

901 New York Avenue, N.W.

Washington, DC 20001

Telephone: (202) 346-4000

Facsimile: (202) 346-4444

dyoung@goodwinprocter.com